

**Docket No. FWS-HQ-FAC-2015-0005**

The Virginia State Chapter of The Wildlife Society, the principal organization representing wildlife professionals across the Commonwealth, supports the U.S. Fish and Wildlife Service's interim rule "Injurious Wildlife Species: Listing Salamanders Due to Risk of Salamander Chytrid Fungus" (Bsal).

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of nearly 11,000 professional wildlife biologists and managers dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and habitats worldwide. Our Virginia chapter carries this mission forward in the Commonwealth to ensure our natural resources are managed appropriately and conserved for future generations.

Virginia has 56 species of salamanders, three of which are global endemics – *Plethodon hubrichti*, *P. sherando*, *P. shenandoah* - the latter being federally and state endangered. According to the Fish and Wildlife Service's rule to list 201 species of salamanders, species in the genus *Plethodon* may be carriers of Bsal. Therefore, these rare species may go extinct if exposed to this new threat. Salamanders of all species are extremely valuable to the ecosystems of Virginia, and we cannot afford to allow a potentially fatal fungus to enter the United States and jeopardize these valuable amphibians.

Although the listing of 201 species, including 67 native species, may seem drastic, we believe it is necessary to prevent Bsal from entering the United States. If the fungus is found in or introduced into the United States, the interstate transport prohibition will help prevent it from moving into Virginia or from Virginia to contaminate an adjacent state that also has ecologically valuable salamanders.

As this new rule is implemented, we urge USFWS to accommodate permits for transport of salamanders related to legitimate scientific research. Facilitating pertinent research is often just as important as enacting new regulatory protections for the long-term species conservation.

Thank you for taking this important action to protect our native salamanders. Please don't hesitate to contact me at 540-569-0023 or [nelson.lafon@gmail.com](mailto:nelson.lafon@gmail.com) if you have questions.

Sincerely,

Nelson Lafon, Chair, VATWS Conservation Review Committee